

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-11068-JTD

Jointly Administered

Re: _____

**ORDER AUTHORIZING THE AD HOC COMMITTEE OF NON-US CUSTOMERS
OF FTX.COM TO FILE UNDER SEAL (I) THE VERIFIED STATEMENT OF
EVERSHEDS SUTHERLAND (US) LLP AND MORRIS, NICHOLS, ARSHT &
TUNNELL LLP PURSUANT TO BANKRUPTCY RULE 2019 AND (II) THE
DECLARATION IN SUPPORT OF THE AD HOC COMMITTEE OF NON-US
CUSTOMERS OF FTX.COM'S MOTION TO FILE UNDER SEAL THE VERIFIED
STATEMENT OF EVERSHEDS SUTHERLAND (US) LLP AND MORRIS, NICHOLS,
ARSHT & TUNNELL LLP PURSUANT TO BANKRUPTCY RULE 2019**

Upon the motion (the "Motion")² of the Ad Hoc Committee for entry of an order, pursuant to sections 105(a), 107(b), and 107(c) of title 11 of the United States Code, rules 9018 and 9037 of the Federal Rules of Bankruptcy Procedure, and rule 9018-1(d) of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the District of Delaware authorizing the Ad Hoc Committee to file the Rule 2019 Statement and other pleadings under seal; and adequate notice of the Motion having been given as set forth in the Motion; and it appearing that no other or further notice is necessary; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein are defined in the Motion.

determined that consideration of the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief requested in the Motion, and that such relief is in the best interests of the Debtors, their estates, their creditors and other parties in interest; and upon the record in these proceedings; and after due deliberation;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Pursuant to sections 105(a), 107(b), and 107(c) of the Bankruptcy Code, Bankruptcy Rules 9037(d), and Local Rule 9018-1(d), the Ad Hoc Committee is authorized to seal portions of (a) the Rule 2019 Statement, including any amended Rule 2019 Statements; (b) the Member Declaration; and (c) all other filings, if any (together, the Sealed Filings) containing (i) the Personally Identifying Information and (ii) the Entities' names (together, the "Sealed Information").
3. The Ad Hoc Committee is authorized to redact the Sealed Information from any proofs of claims filed with the claims register on behalf of the Members.
4. The Debtors' claims agent is authorized to redact the Sealed Information from the claims register.
5. The Sealed Filings shall remain under seal and not be made available to anyone, except that unredacted copies shall be provided to this Court, the Debtors, the Official Committee, the U.S. Trustee, and others upon further Court order. Each party receiving an unredacted copy of the Sealed Filings shall keep such information confidential.

6. To the extent any party provided with an unredacted copy of the Sealed Filings files any pleading that includes the Sealed Information, such party shall redact the Sealed Information from its pleading.

7. The Ad Hoc Committee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.